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Attorney for Defendants the Honorable Edward A. Jerejian and
John Jay Hoffman

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE

MARC A. STEPHENS,) HON. WILLIAM J. MARTINI, U.S.D.J.

Plaintiff,)

Docket No. 14-06688

v.)

THE HONORABLE EDWARD A.)
JEREJIAN, in his)
Official Capacity as)
Judge of the Superior)
Court of Bergen County;)
CHIEF ARTHUR O'KEEFE, as)
an individual, and in)
his Official Capacity as)
Chief of the Englewood,)
New Jersey Police)
Department)
JOHN JAY HOFFMAN in his)
Official Capacity as)
Attorney General of New)
Jersey)

Defendants.)

**DEFENDANTS' NOTICE OF
MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT
PURSUANT TO FED R. CIV. P.
12 (b) (1) AND 12 (b) (6)**

TO: Clerk of the Court

Marc A. Stephens
271 Rosemont Place
Englewood, NJ 07631

PLEASE TAKE NOTICE that on May 4, 2015, the undersigned John J. Hoffman, Acting Attorney General of New Jersey, by Adam Robert Gibbons, Deputy Attorney General, as Attorney for Defendants, the Honorable Edward A. Jerejian, J.S.C., and John Jay Hoffman, shall move before the Honorable William J. Martini, U.S.D.J., in Federal District Court for the District of New Jersey (Newark), for an Order dismissing Plaintiff's Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6). Defendants will rely on the brief, which is being filed simultaneously with this Notice of Motion.

A proposed form of Order is attached hereto.

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Adam Robert Gibbons
Adam Robert Gibbons
Deputy Attorney General
Attorney ID # 093732014

Dated: April 8, 2015